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*Attorneys for Rutgers, The State University of New Jersey, et al.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CHILDREN'S HEALTH DEFENSE, INC.,  
PETER CORDI, RAEYLONNE MILLER,  
KAYLA MATEO, ADRIANA PINTO, JAKE  
BOTHE, AND DOES 1-13,

Plaintiffs,

v.

RUTGERS, THE STATE UNIVERSITY OF  
NEW JERSEY, BOARD OF GOVERNORS,  
RUTGERS SCHOOL OF BIOMEDICAL  
AND HEALTH SCIENCES, CHANCELLOR  
BRIAN L. STROM, PRESIDENT  
JONATHAN HOLLOWAY, in their official  
capacities,

Defendants.

Civil Action No. 3:21-cv-15333-ZNQ-TJB

Civil Action

(Document Filed Electronically)

**STIPULATION AND PROPOSED  
ORDER**

It is hereby stipulated and agreed by and between the attorneys for Plaintiffs Children's Health Defense, Inc., Peter Cordi, Raelynne Miller, Kayla Mateo, Adriana Pinto, Jake Bothe, and

Does 1-13 (“Plaintiffs”), and Defendants Rutgers, The State University of New Jersey, Board of Governors, Rutgers, School of Biomedical and Health Sciences, Chancellor Brian L. Strom, and President Jonathan Holloway (“Defendants”) that Plaintiffs will file an amended complaint by **October 19, 2021.**

The parties also propose the following briefing schedule for Defendants’ anticipated motion to dismiss the amended complaint:

1. Defendants will file the motion to dismiss by **November 19, 2021**;
2. Plaintiffs will oppose the motion to dismiss by **December 31, 2021**;
3. Defendants will reply to Plaintiffs’ opposition by **January 14, 2022**.

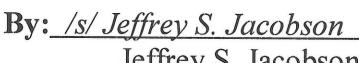
Separately, Defendants anticipate filing a motion requiring any and all “Doe” plaintiffs to comply with Fed. R. Civ. P. 10(a) (*i.e.*, to sue in their real names). That motion is unaffected by this stipulation and will be filed in the regular course.

**GOMEZ LLC ATTORNEY AT LAW**

By:   
/s/  
Julio C. Gomez

Dated: October 6, 2021

**FAEGRE DRINKER BIDDLE & REATH,  
LLP**

By:   
/s/  
Jeffrey S. Jacobson

Dated: October 6, 2021

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
Hon.